

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

A. SCHULMAN, INC.,)	
)	
Plaintiff and Counter-Defendant,)	Case No. 1:15 CV 1760
)	
v.)	Judge Patricia A. Gaughan
)	
POLYONE CORPORATION and)	
POLYONE DESIGNED STRUCTURES)	DECLARATION OF
AND SOLUTIONS LLC)	DR. TODD J. MENNA
)	
Defendants and Counter-Plaintiffs.)	
)	

I, Dr. Todd J. Menna, declare under penalty of perjury:

1. I am a resident of Wisconsin and am over 18 years of age. I have no legal disabilities that would prevent me from testifying to the matters set forth in this Declaration.
2. I am the Engineering Manager at Element Materials Technology, Inc., a company that provides investigative analysis related to failure analysis, mechanical testing, and material qualification projects.
3. I have been retained by Defendant, PolyOne Corporation and PolyOne Designed Structures and Solutions LLC ("PolyOne"), to aid in the understanding of several features described in U.S. Patent Nos. 8,007,902 and 8,182,906 ("the asserted patents") and the meaning of certain claim terms in the asserted patents. My opinions are set forth in the L.P.R. 4.3(a) Declaration of Dr. Todd J. Menna in Support of PolyOne's Proposed Claim Construction, signed September 30, 2016. Attached as **Exhibit A** is a true and correct copy of my L.P.R. 4.3(a) Declaration.
4. My credentials, including my educational background, professional experience,

professional credentials, and accomplishments are set forth in my Curriculum Vitae, which is enclosed with my L.P.R. 4.3(a) Declaration as Exhibit 1. In addition to the information in by C.V., my background qualifications are further set forth in my L.P.R. 4.3(a) Declaration at pages 1-2.

5. My opinions and the basis for my opinions are set forth in detail in my L.P.R. 4.3(a) Declaration, and are adopted and incorporated herein.

6. My L.P.R. 4.3(a) Declaration sets forth facts on which my opinions are based, including facts about polymer materials sciences and material testing. The facts contained in my L.P.R. 4.3(a) Declaration are true, based on my personal knowledge, and I am competent to testify to them.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed February 01, 2017.



Todd J. Menna